

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

NETWORK-1 TECHNOLOGIES, INC.,

Plaintiff,

v.

GOOGLE LLC and YOUTUBE, LLC,

Defendants.

14 Civ. 2396 (PGG-SN)

14 Civ. 9558 (PGG-SN)

**JOINT STIPULATION TO MODIFY THE DEADLINE FOR
THE CLOSE OF EXPERT DISCOVERY**

Plaintiff Network-1 Technologies, Inc. and Defendants Google LLC and YouTube, LLC, through their undersigned counsel, hereby stipulate, subject to approval by this Court, to modify the deadlines set forth in the October 21, 2019 Joint Proposed Civil Case Management Plan and Scheduling Order (Dkt. No. 189)¹ and the March 5, 2020 Joint Stipulation to Modify Deadlines Relating to the Close of Expert Discovery and Dispositive Motions (Dkt. No. 209).

WHEREAS, the close of expert discovery is currently April 24, 2020;

WHEREAS, numerous states and municipalities are under “stay at home” orders, including those in which at least some counsel of record and expert witnesses reside;

WHEREAS, the parties have a disagreement concerning the appropriate deadlines for submission of letters seeking leave to file dispositive motions and oppositions thereto and previously agreed to submit either a joint stipulation reflecting their agreement or a joint letter setting forth their respective positions on the issue for resolution by the Court;

¹ Citations to the docket refer to docket entries in Case No. 14 Civ. 2396 (PGG-SN).

NOW THEREFORE, the parties hereby stipulate and agree as follows:

1. The parties must complete expert discovery, including depositions of experts, by June 30, 2020;

2. The parties have not been able to resolve their disagreement concerning the appropriate deadlines for submission of letters seeking leave to file dispositive motions and oppositions thereto, and therefore shall submit a joint letter setting forth their respective positions on the issue for resolution by the Court no later than one month before the close of expert discovery.

SO STIPULATED.

Dated: March 26, 2020

Respectfully submitted,

RUSS, AUGUST & KABAT

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SO ORDERED.

Date: _____

Paul G. Gardephe
United States District Judge